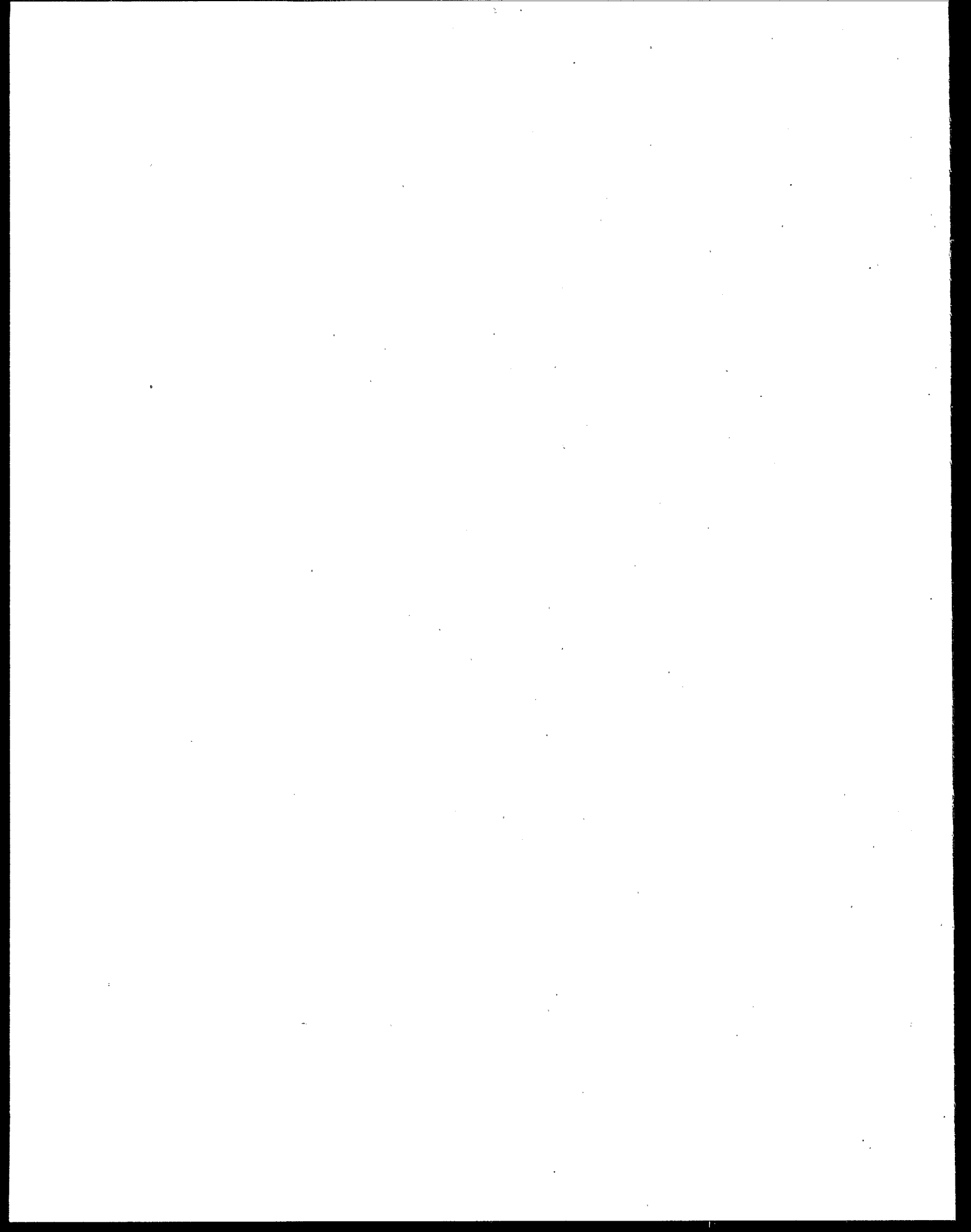




Successful Practices in Title III Implementation

**Chemical Emergency
Preparedness and Prevention
Technical Assistance Bulletin**

**State of Florida
District 5 LEPC, Florida
Monroe County, Michigan
State of Alaska
Subject Index**



ABOUT THIS BULLETIN

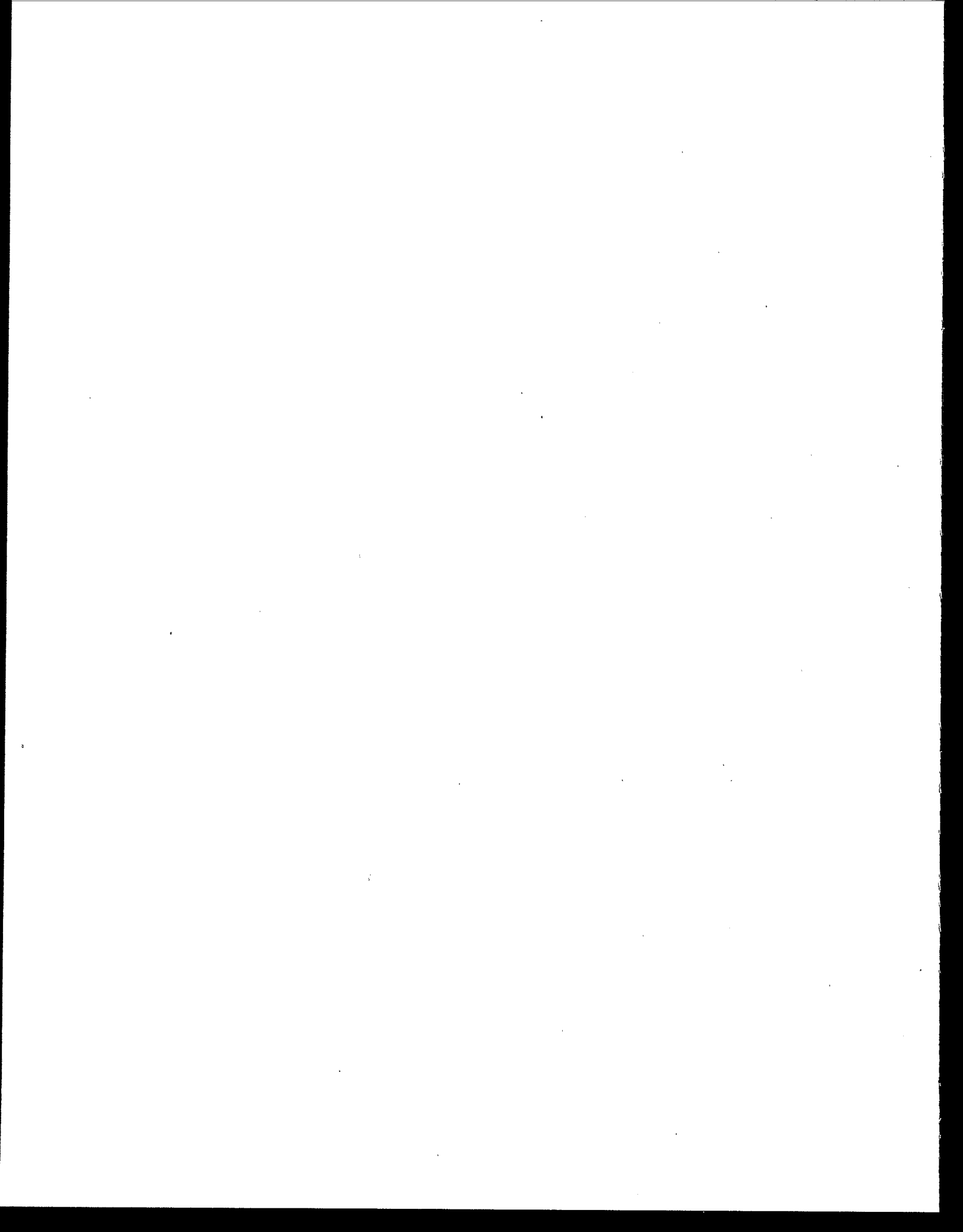
This is another in a series of bulletins that EPA is issuing to provide examples of implementation programs and strategies of the Emergency Planning and Community Right-to-Know Act of 1986, known as Title III, that are innovative or have proven effective. The purpose of these bulletins is to share information on successful practices with Local Emergency Planning Committees (LEPCs), State Emergency Response Commissions (SERCs), fire departments, and other Title III implementing agencies throughout the country in the hope that such information will prove useful to other SERCs and LEPCs as their programs develop and evolve.

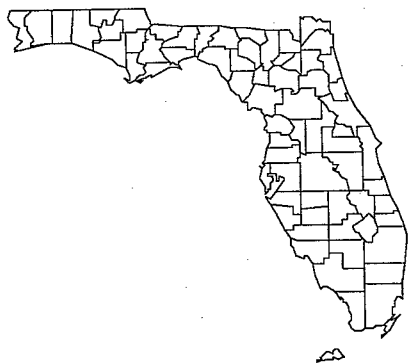
Elements from the programs featured here may be transferable to other programs in similar communities or with similar situations. The bulletins provide information on a variety of practices — for example, planning, compliance, information management, hazards analysis, and outreach. The particular topics covered in each LEPC or SERC profile are listed in the box at the bottom of the first page of the profile for easy reference, along with descriptions of the planning district or state and LEPC or SERC membership.

The descriptions of the innovative and effective implementation programs and strategies are not exhaustive. They are meant to provide readers with enough information to determine if a particular approach is applicable to their own situation. Each profile includes a contact person who can provide more detailed information.

For your convenience, a subject index covering the contents of the ten **Successful Practices** bulletins has been included in this bulletin. The index is designed to allow the reader to identify successful Title III implementation practices by topic area, and then locate the **Successful Practices** bulletin in which the practice was profiled. Details on all ten bulletins, and how to order them, are provided on page 21.

If you know of Title III implementation efforts you feel would be of interest to others and that we should identify in **Successful Practices**, please contact your EPA Regional Chemical Emergency Preparedness and Prevention coordinator (see the list on page 22), or the Emergency Planning and Community Right-to-Know Information Hotline at (800) 535-0202.





State of Florida

A pre-existing state Hazardous Materials Task Force, consisting of representatives from various state agencies with emergency response duties, served as the foundation for the establishment of the Florida Emergency Response Commission. In 1988, the SARA Title III program in Florida was enhanced by the passage of Senate Bill (S.B.) 954, the Florida Hazardous Materials Emergency Response and Community Right-to-Know Act. The law requires the Florida Department of Community Affairs (DCA) to provide administrative support to the Florida SERC. DCA's Division of Emergency Management (DEM) serves as the lead agency for chemical emergency preparedness and the implementation of SARA Title III in Florida.

Compliance

Under the provisions of S.B. 954, DCA was required to establish a verification program to assess compliance with the Florida reporting requirements. The first step in this task was a cross-referencing check made with existing state databases (e.g., those of the Department of Revenue, Chamber of Commerce, Department of Citrus, Public Service Commission, and Health and Rehabilitative Services). DCA also used the list of Title III section 313 submissions, the fire marshal's liquid petroleum gas database, the Florida Department of Agriculture/Food and Drug Administration's list of ammonia freezers, and the underground storage tank database to

SERC Profile

Membership: 19 members, including representatives from the Departments of Community Affairs, Environmental Regulation, Natural Resources, Transportation, Labor, and Law Enforcement; State Fire Marshal; Fire Chief's Association; Governor's Office; Regional Planning Council Association; Emergency Preparedness Association; Association of Counties; League of Cities; Florida Power Corporation; Legal Environmental Assistance Foundation; and labor and trade associations (chair: secretary of the Department of Community Affairs).

Organization: 11 LEPCs organized according to the pre-existing regional planning districts, each of which consists of three to eleven of the 67 counties in the state.

Topics: Compliance
Outreach
Funding

identify facilities. Potential non-compliers are sent a certified letter at addresses identified through the Florida Secretary of State's corporate database. Under the law, the targeted facility is given thirty days to report before late fees are assessed. Over the last two years, nearly 3,000 initial notices of violations and over 650 follow-up notices have been mailed to companies statewide.

During 1989 and 1990, the SERC conducted demonstration compliance projects in the cities of Tampa, Jacksonville, and Miami. Fire department personnel in Tampa and local environmental inspectors in Jacksonville and Miami conducted a door-to-door survey of facilities. As a result of this project, the SERC developed a better sense of the number of potentially covered facilities. Many sites suspected of being subject to reporting did not actually qualify because they did not exceed the reporting thresholds. In addition, the SERC collaborated with EPA Region 4 in the final phase of an outreach project in Manatee County that was initiated in 1989. After two formal mailouts, approximately 25 facilities, suspected of being out of compliance, were visited to determine formally whether they were subject to Title III. In combination with an extensive media outreach effort, the entire project substantially increased the number of reporting facilities.

Beyond the compliance program, S.B. 954 also authorizes the state to enforce and collect fines for failure to comply with the federally enforceable provisions of Title III. As of mid-1992, the SERC had issued 31 Notices of Violation regarding the provisions of section 304 of Title III. Settlement agreements with monetary penalties of over \$140,000 have been entered into for sixteen of the enforcement actions. In addition to monetary penalties, the SERC has required facilities to perform training, attend LEPC meetings, and prepare compliance articles for trade publications.

Outreach

To assist Florida facilities in complying with the requirements of the state and federal emergency planning and community right-to-know regulations, the SERC prepares a handbook on an annual basis. The 1991 handbook consists of a thorough section-by-section overview of the regulatory requirements, two consolidated Title III chemical lists (arranged both alphabetically and by Chemical Abstract Service number), and the Florida reporting forms and instructions for sections 302, 304, and 311-312 of Title III. Florida requires the submission of a state Tier II form, which includes reporting of actual numbers, rather than ranges, for the average and maximum daily amounts of the hazardous chemical on site.

The SERC has been involved in three outreach efforts aimed at specific industries — government contractors (federal government-owned, but contractor-operated facilities are covered under Title III), agriculture, and compressed gas manufacturers and distributors — to improve both awareness and compliance. Because the definition of facility under Title III specifically does not include federal facilities, the SERC worked in 1988 and 1989 to increase awareness among government contractors operating federal facilities of their reporting obligations under SARA Title III. The program was initiated by a DCA presentation at Cape Canaveral for the National Aeronautics and Space Administration (NASA) and its contractors. Representing both NASA facilities as well as other contractor-operated government facilities in the state, the contractor attendees are now in compliance with the requirements of Title III, and, if covered under section 302, have been the subject of a hazards analysis conducted in developing their regional LEPC's plan.

Inspired by a document developed by the Kansas SERC, the Florida SERC developed and distributed through state agricultural trade

organizations a list to cross-reference Title III section 302 extremely hazardous substances with the trade names of common agricultural chemical products. The SERC also assisted the Compressed Gas Association in the preparation of detailed written guidance on compliance with Title III. The guidance was mailed in May 1990; the state then sent a follow-up letter to 65 suppliers to solicit cooperation in identifying potentially subject facilities. The information provided resulted in the compilation of a list of 2,500 facilities, of which 1,000 were previously unknown. As a result, many suppliers subsequently provided facilities with an information package on Title III requirements.

The SERC also publishes HAZ MATTERS, a quarterly newsletter describing the activities of the state's 11 LEPCs. Distributed in advance of the quarterly SERC meetings, the articles are prepared by the LEPCs and serve as a basis for discussion at a meeting of LEPC chairs and SERC staff on the day before the official SERC meeting. Outstanding issues can then be raised at the SERC meeting the following day.

The SERC, in conjunction with the 11 LEPCs, established January 26 - February 1, 1992, as Emergency Planning and Community Right-to-Know Week. Interviews with emergency planning officials were held for local television and radio stations, daily articles were prepared for local newspapers, and facility compliance seminars were conducted throughout the state. The effort was designed to enhance awareness of and increase compliance with the March 1 annual reporting deadline. The SERC also provides news articles for local papers in February and June to advertise the Title III sections 312 and 313 reporting deadlines.

Funding

S. B. 954 also established the initial Florida fee system for Title III submissions. The state charges a one-time fee of \$50 for filing under section 302. In addition, there is an

annual registration fee for companies reporting under both sections 302 and 312 ranging from \$25 to \$2,000; the amount of the fee depends on the total number of persons employed by the company's owner or operator within the state. Those facilities only required to report under section 312 pay a reduced registration fee ranging from \$25 to \$500. Government entities are exempt from paying the annual registration fee. The law also authorizes a late fee of up to \$2,000 if a facility has not filed within 30 days of an initial notice and up to \$4,000 after 150 days. Under the provisions of House Bill 2337, which became effective October 1, 1992, DCA is also authorized to assess facilities an annual reporting fee of up to \$150 for each report filed under section 313; implementing regulations for this law have not yet been issued.

The 1988 law also created a Hazardous Materials Administration Trust Fund to support DCA activities. The trust fund receives all fees and penalties collected under the fee system; the money is used to support the implementation of Title III by the SERC and the LEPCs in amounts authorized annually by the state legislature. The trust fund pays the DCA staff who support the SERC, covers all SERC supplies and other expenses, and provides grants to the counties for emergency planning purposes. The SERC used trust fund money to install the Hazardous Materials Management Information System, a database system that manages all of the information reported under Title III (sections 302, 304, 311-312, and 313) for 12,000 state facilities. The SERC receives no money out of general state revenues.

The 11 Florida LEPCs were designated along the lines of the pre-existing Regional Planning Councils (RPCs), which are responsible for addressing land use policy and coordinating inter-governmental emergency planning. The SERC has a formal, performance-based agreement to provide funding to the LEPCs. The LEPCs receive money from the trust fund if they meet specific criteria according to a pre-

Pollution Prevention Through Toxics Use Reduction

The Department of Environmental Regulation (DER) sponsors a voluntary, cooperative, non-regulatory waste reduction program known as the Waste Reduction Assistance Program (WRAP). Retired engineers are sent out at the request of the facility to provide expertise in reducing the use of hazardous substances, the generation of hazardous wastes, and releases of air toxics. The program covers facilities handling chemicals reportable under section 313 of Title III, and focus on individual process units or even an entire facility. Although the initial focus of the visit is on housekeeping issues, inventory management, and preventive maintenance, potential process modifications are also examined. Upon completion of the facility visit, the engineer(s) provides the facility with a list of suggestions to reduce waste generation and save related expenses. Typical suggestions include material substitution, such as replacing 1,1,1-trichloroethane with less hazardous materials or non-toxic cleaners, or recycling used water in electroplating operations.

Over the past four years, more than 184 facilities have participated in the program, including Department of Defense facilities (e.g., U.S. Air Force bases) and chemical manufacturers, as well as small facilities. More than \$3.7 million in savings have been achieved by Florida businesses and government facilities as a result of these source reduction efforts. To support the program, the SERC has coordinated with DER to mail letters to the chief executive officers of facilities reporting under section 313 to inform them of the program, and staff have made presentations on the program to various audiences. The SERC and local and state environmental regulatory staff refer businesses to the WRAP if they identify businesses interested in doing the right thing to protect the community. Many businesses volunteer for free pollution prevention technical assistance, thereby saving dollars while protecting environmental quality in Florida.

determined scope of work. These criteria include holding regular LEPC meetings, preparing an integrated LEPC hazardous materials contingency plan from the individual county plans, and conducting facility compliance and Title III training seminars. Over the last two years, nearly \$75,000 was provided to each LEPC to fund a full-time staff position.

LESSONS LEARNED

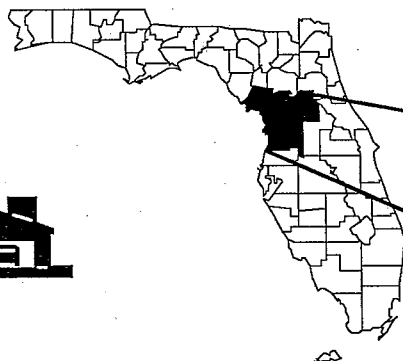
Prevention is Born Out of Preparedness. One of the key developments over the first few years of the Title III program in Florida has been the positive impact of the reporting and fee system burden on facilities. In addition to the successes of WRAP, the burden imposed by these regulations has helped convince a number of facilities to modify their use of hazardous substances, and thereby reduce the risk to the community posed by an accidental release. Such modifications have included reducing the quantity of a hazardous substance onsite to fall below the section 302 or 311-312 reporting thresholds and substituting less dangerous chemicals in on-going processes.

Title III Efforts Serve as Foundation.

Initially, the SERC believed that outreach and compliance efforts would be simplified by the use of pre-existing lists of subject facilities prepared under other government programs. When the required compliance verification program was initiated, however, it became apparent that the SERC would need to compile its own facility listing; various exemptions, threshold requirements, and other issues rendered existing lists only partially useful. Now that the compliance verification program has established a separate Title III list, other agencies have asked the SERC to use this list to identify potentially subject facilities under their own programs. For example, the Florida Department of Environmental Regulation was interested in data on facilities with significant tank storage volumes.

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District 5 LEPC, Florida

The District 5 LEPC is composed of five counties on or near the coast of the Gulf of Mexico in central Florida: Levy, Citrus, Marion, Sumter, and Hernando. The already existing Withlacoochee Regional Planning Council was used to provide the necessary staff support for the District 5 LEPC. Several standing committees address the principal responsibilities of the LEPC: the Regional Hazardous Materials Response Committee, the Hospital Preparedness Committee, the Public Relations and Education Committee, the Plan Review Committee, and the Plan Exercise Committee. Through mutual-aid

agreements, the five counties have successfully combined their resources to prepare for and respond to hazardous materials release incidents, as well as to promote awareness of the Emergency Planning and Community Right-to-Know Act (EPCRA, also known as Title III).

Outreach

The LEPC works closely with the state to encourage compliance with Title III reporting requirements. The Public Relations and Education Committee communicates to industry and the public the

LEPC Profile

Membership:	25 members and 13 alternates, including representatives from local law enforcement, emergency management, fire departments, medical centers, the Department of Environmental Regulation, the news media, a community college, industry, and interested citizens.
Population:	447,000
Facilities:	175 facilities reporting under section 302, and 399 facilities reporting under sections 311-312, including waste water treatment plants, potable water utilities, phosphate mines, gasoline storage tanks, and an explosives manufacturer.
Topics:	<ul style="list-style-type: none"> Outreach Compliance Funding Emergency Response Planning Exercises

importance of reporting under Title III, helps facilities report properly, and informs the public that emergency planning is being done. The committee has produced a slide and video presentation about Title III and has also procured a television public service announcement from another district to help meet these objectives. In addition, as part of an educational program, the committee is producing a brochure for school children regarding hazardous materials.

The most visible effort to increase familiarity with Title III reporting requirements thus far has been the state-sponsored EPCRA Awareness Week: January 26-February 1, 1992. The District 5 LEPC publicized its own plans for the week to alert the regulated community to related activities. Jeanne Schmotzer, principal planner and staff for the LEPC, went on a radio talk show to discuss the importance of Title III and the events planned for the officially designated week. Newspaper articles also gave the event visibility. Schmotzer felt that participation from EPA and the state Division of Community Affairs enhanced the credibility of the LEPC.

The LEPC conducted "How to Comply" seminars, a Computer-Aided Management of Emergency Operations (CAMEO) presentation, and a Title III slide presentation. They also produced a video on reporting requirements and related issues for distribution to the Chamber of Commerce and other organizations. These activities were held in conjunction with the regularly scheduled LEPC meeting, and were well attended by representatives from local facilities and several concerned citizens. The effort was such a success that the LEPC plans to repeat it next year.

Compliance

The State of Florida has taken a pro-active approach toward increasing compliance with Title III reporting requirements. The Department of Community Affairs revised

section 312 Tier II forms to include actual amounts of hazardous chemicals rather than less specific ranges of pounds requested by the federal forms. They then took the initiative to mass mail the new forms to affected facilities. To assist the facilities, the state also sends them a reporting package. The package includes a compliance handbook and a map of the state indicating their district with the LEPC staff contact's name and address.

As a direct result of its own outreach efforts combined with the state's efforts, the District 5 LEPC has been deluged with requests for technical assistance. The LEPC is readily providing this assistance in completing the Tier II form. "The state is truly dedicated to this program," explains Jeanne Schmotzer, "and the facility owners and operators know that we care about them. There's been a lot of frustration in the industry about the increased burden; the perception has been that these forms were not written with real people in mind. We have people coming in here with all of their paperwork and asking for help, so we sit down with them and guide them through the process. They're more willing to make the effort to comply if they know we're willing to help."

The LEPC staff may also assist facilities in finding ways to reduce their inventory of toxic chemicals and in substituting less hazardous substances for chemicals when possible. Many facilities have already taken the initiative to reduce toxic chemical inventories on their own. For those that have not, the LEPC suggests contacting other facilities who have an engineer on staff, or can easily contract with one, to examine their toxic chemical inventory. Facilities can also contact their suppliers for suggestions as to which chemicals can replace the more toxic ones they use and store. A simple reduction of a stockpile, such as storing a one-year supply of a chemical rather than a multi-year supply, can decrease the hazards within a facility. Overall, the combined efforts of the

state and the LEPC to assist facilities in reducing their toxic chemical inventories have met with success.

Funding

The hazardous materials planning section of the state Division of Emergency Management collects fees from facilities for filing under section 302 and section 312, a portion of which are then divided up and parcelled out equally to the LEPCs in order to staff a position. Last year, the District 5 Regional Planning Council received approximately \$41,000 of the \$450,000 LEPC fund. Individual counties may also receive grants from the state fund, based on their percentage of the state population, their number of facilities, and a fixed amount allocated to each county. To qualify for grants from the state, the counties must produce a county hazardous materials emergency plan and provide a hazards analysis of their facilities. Last year, Hernando County received approximately \$8,000, used to defray the expenses of personnel (the county planner), equipment purchases, and overhead (i.e., the cost of conducting a hazards analysis for the regulated facilities in the county, etc.).

Emergency Response

In early 1991, the counties in District 5 amended the mutual aid agreements among their fire departments to include provisions for a hazardous materials incident. To keep expenses down, the counties decided to buy equipment on a smaller scale and pool their resources through a master equipment list. For full-scale emergencies, Citrus County has a fully equipped 20-foot response trailer, complete with computers using CAMEO software to provide a site chemical inventory, and ABTROS software to assess the hazards of certain chemicals if inadvertently mixed together. Marion County is developing a hazardous materials emergency

response team comparable to the one in Citrus County. The LEPC has addressed the need for a common radio frequency and compatible radio equipment among the counties to improve communications in an emergency. Although no new equipment has been bought, the regional hazardous materials emergency plan lists each county's radio frequencies for easy reference.

Planning

Another interesting element of District 5's activities is its attention to potential transportation accidents involving hazardous materials. Interstate 75 and Routes 441 and 301 serve a great number of trucks travelling north from the industrial areas in Tampa and St. Petersburg. Trucks transporting explosives, catalysts, fuel, and other hazardous materials used in manufacturing pose a danger to the community, but are not included in regional hazardous materials emergency plans.

The need for such planning was demonstrated in the summer of 1988, when a truck carrying 8,000 gallons of auto transmission fluid drove off of Interstate 75 into a ravine. The accident occurred in a rural area during the early hours of the morning, the busiest time of day for truck traffic. The emergency response team closed the highway, surrounded the truck, and allowed it to burn down. The driver of the truck, who was killed, could not be identified until the trucking company was contacted. When the company was traced and could identify the contents of the truck, the emergency response team noted that such an accident could pose serious hazards to the community in slightly different circumstances. If the truck had been carrying a more toxic chemical with explosive properties or a gaseous chemical that could spread beyond the interstate, or, if the accident had occurred in a more populous area, local residents, livestock, and food crops could have been injured or destroyed.

Railroads are another transportation concern to District 5 emergency planners. In February 1992, two rail cars containing 179,000 pounds of chlorine derailed from the train tracks running through a residential area in Ocala, a large city in Marion County. Railroads do not have to notify the authorities of a derailment unless there is a leak, so neither the city nor the county knew about the accident until a neighbor reported it several hours after it occurred. The LEPC pointed out that even in the absence of a leak, a derailed railroad car carrying a hazardous substance poses risks to those attempting to get it back on the tracks. Since this incident, government and railroad officials have agreed to work with local fire departments to provide more information to the counties about their operations, in order to better prepare for a more serious incident in the future.

As a result of these and other incidents, Hernando County has included a transportation section in its hazardous materials emergency plan, the first county in the state to do so. The LEPC intends to expand this approach to include the other counties in District 5. The LEPC has also made recommendations to local governments to change accident reporting regulations, so as to include incidents such as the one described above. In addition, the LEPC has submitted the name of a Florida Department of

Transportation representative to the SERC for membership in the LEPC.

Exercises

On September 21, 1991, the District 5 LEPC conducted one of Florida's first, and certainly most ambitious, multi-jurisdictional field exercises for a toxic chemical release incident in the city of Dunnellon in Marion County. The LEPC's Plan Exercise Committee led an effort that culminated in a full-scale exercise involving more than 140 people from 27 organizations and all five counties. The scenario involved an urban area in which a tanker truck carrying sulfuric acid collided with a train. Diesel fuel was spilled as a result of the collision. Possible hazards included the diesel fuel mixing with sulfuric acid, corrosion of metals causing a large release and chemical reaction with surrounding materials, a release to the Withlacoochee River through storm drains with a build-up of hydrogen gas, and an explosion in storm drains with damage to water mains.

In its review of the exercise, the LEPC identified several areas for improvement, most notably the need for increased training for first responders, some of whom are volunteer fire fighters, and the need for better communication among the

Working with the Medical Community

Local hospitals are one segment of the community that have already benefited from the LEPC's increased outreach efforts. The LEPC heard about another district's success in surveying area hospitals' chemical emergency preparedness and promptly adopted the idea. A committee was formed to assess each hospital's level of preparedness for treating victims of a toxic chemical release. The committee examined every phase of treatment, including ambulance services. Unfortunately, the resulting report concluded that the hospitals in the region were not well prepared for such an incident.

In response to these findings, the LEPC developed a list of recommended practices and resources necessary for the hospitals to treat chemical accident victims. As a follow up to that effort, the LEPC visited area hospitals to assess what resources the hospitals actually had. During these visits, the LEPC emphasized that hospitals could upgrade their facilities to address deficiencies in existing capabilities without making huge expenditures. Recently, an emergency room doctor at a major hospital in Hernando County donated her time to assist the LEPC and the other area hospitals in developing procedures for treating potential medical emergencies associated with a chemical accident. The Munroe Regional Medical Center in Marion County was undergoing major renovations, and at the suggestion of the LEPC, took the opportunity to install a special hazardous materials decontamination room.

counties. The exercise also exposed deficiencies in the understanding of the Incident Command System. Each participating agency will review its standard operating procedures, which they believe fell short.

LESSONS LEARNED

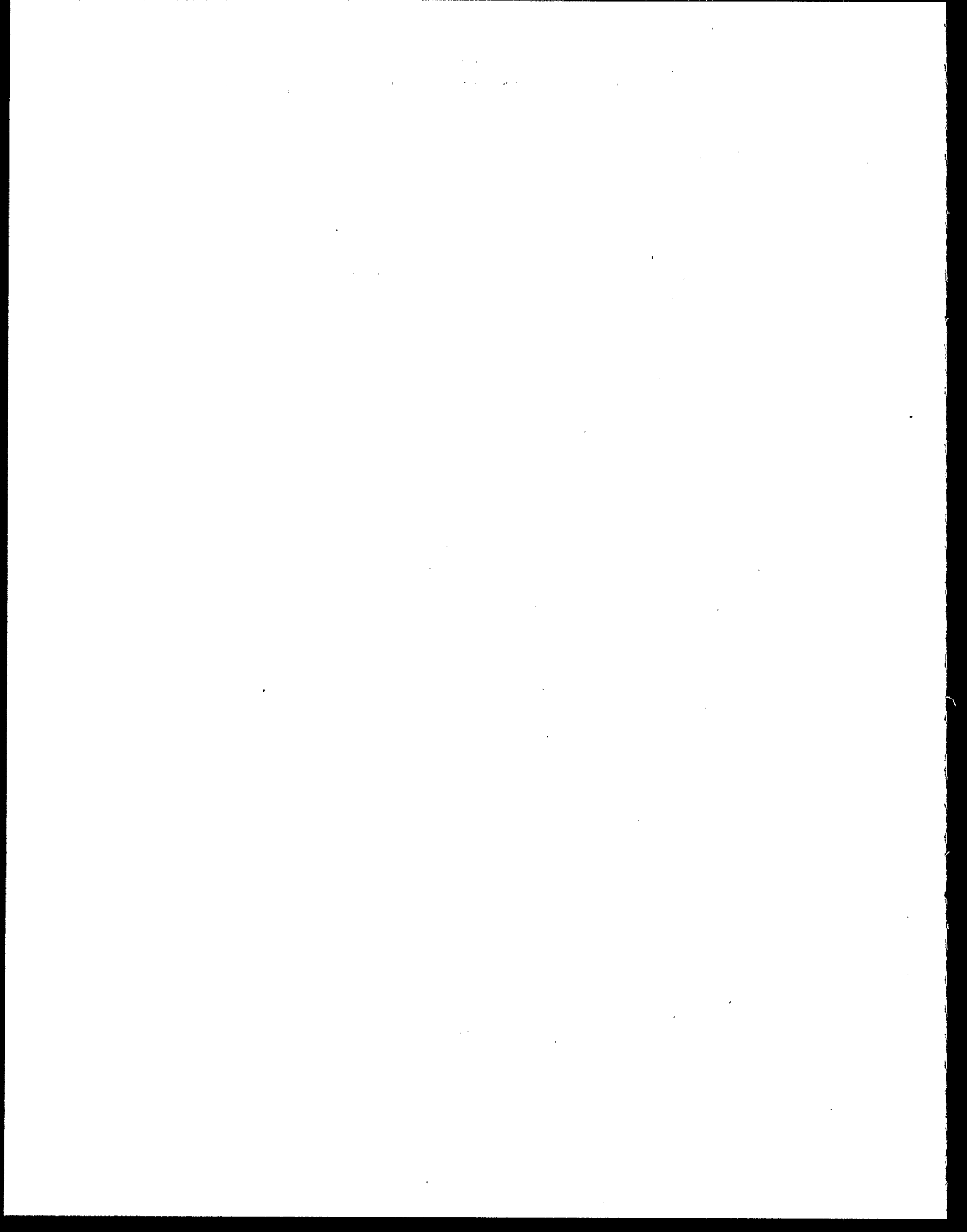
More Assistance Leads to More Compliance. Probably the most practical element of the LEPC's SARA Title III implementation efforts has been the technical assistance to facilities attempting to comply with reporting regulations. By meeting facilities half way in their efforts, the LEPC has seen compliance increase dramatically. A strong commitment from the state level has contributed notably to the LEPC's successful outreach activities.

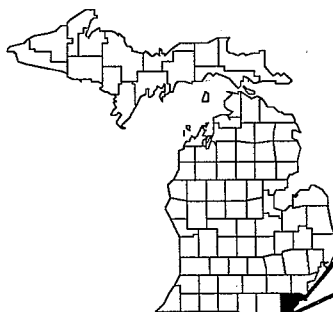
Cooperation Is the Key to a Successful LEPC. Cooperation among the counties within the LEPC and with other LEPCs has also been vital to the success of the Title III program. New ideas such as the hospital preparedness survey are disseminated widely, adapted freely, and implemented at both the state and local level. Resources and outreach materials are also shared. Thus, the regulatory community has presented a coherent program to industry and to the public.

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Monroe County, Michigan

Monroe County is situated in the southeastern corner of Michigan, bordering Ohio to the south and Lake Erie to the east. The county's 556 square miles are primarily composed of farmland and small towns.

Monroe County has set the standard in Michigan and the nation for incorporating the farming community into the larger web of the emergency response community. Although the Emergency Planning and Community Right to Know Act of 1986 (EPCRA, or commonly known as Title III)

did not specifically target farms, Monroe County contains a large number of farms that must comply with the emergency planning requirements in section 302 of Title III. As a result, a model program was developed and implemented for the county that incorporates the specific needs of the farming community. The program, recently approved by Michigan's SERC, will ensure that farmers with extremely hazardous substances in quantities subject to the section 302 reporting requirements will be able to comply with Title III regulations in an easy, yet comprehensive manner.

LEPC Profile

Membership: 16 members, including representatives from state and local government, law enforcement, emergency management, fire services, first aid, public health, environmental health, hospital services, transportation, media, community groups, facility owners/operators, education, agriculture, and organized labor. The Monroe County LEPC is divided into 5 subcommittees: Budget, Right-to-Know/Notification, Planning, Training, and Resources.

Population: 134,000

Facilities: Approximately 1,400 farms as well as a coal-fired power station, a wastewater treatment plant, a water treatment plant, paper companies, and several small manufacturing companies.

Topics: Outreach
Planning
Funding

Outreach

One of the distinctive characteristics of Title III is that emergency response plans must address the specific characteristics of each community. Monroe County is distinguished by the number of farms subject to Title III in comparison with other types of facilities using hazardous substances. Modern farming techniques pose a potential threat to the community because they involve the controlled use of a variety of chemicals on EPA's list of extremely hazardous substances (EHSs), particularly anhydrous ammonia. In some communities, the risks associated with farming are generally ignored because of the seemingly bigger dangers presented by industrial facilities. Until recently, this phenomenon was true in Monroe County as well. However, the use of EHSs, coupled with the rapidly increasing number of housing subdivisions built in the county's rural areas, has created a large potential for accidents. Further, the storage of hazardous chemicals on farms poses an even greater risk when sensitive populations, such as day care centers and nursing homes, are located in close proximity to the farms. As a result, an urgent need arose for an emergency planning program with a special emphasis on farms.

The initial attempt by the LEPC to communicate the Title III reporting requirements to farmers was a failure. A vague, one-page questionnaire was poorly distributed by the area's agribusinesses and, because it was distributed during the harvest season, was poorly received. The response was limited, and the questionnaires that were received lacked the information the LEPC needed for planning purposes.

After this initial attempt, a Geography and Planning Masters Degree candidate at the University of Toledo decided to focus on the issue as the subject of a thesis project. A team of representatives comprised of university, state, and local representatives was formed to develop

a completely new approach to the problem of outreach to the county's farmers. Among this team of representatives was a hazmat planning specialist from the Emergency Management Division of the Michigan State Police, the pesticide education coordinator of the Michigan State University Cooperative Extension Service, a member of the Michigan Department of Agriculture, a member of the Legislative Council for the Michigan Farm Bureau, the Agriculture Extension Agent in Monroe County, the fire chief of the Bedford Township Station 1, and two professors in the University of Toledo Geography and Planning Department. In addition, several members of the team also served on the Michigan State Emergency Planning Committee (SERC).

The philosophy behind setting up a new program was simplicity: the less the farmers had to do in order to comply, the more effective the program would be. If a farmer could provide the essential, site-specific details of the farm, then the LEPC could prepare comprehensive response plans. The goal of the team was also to create a program that could be used by any planning district in the nation with a significant farm population. "Together," explains Cyril Keiffer, Masters Degree candidate and team leader, "this eclectic group set its sights on a universal goal — to develop a plan to help not only Monroe County, but also any county across the country."

The result was a standardized emergency planning questionnaire that overcame one of the largest obstacles to reporting compliance and effective planning. Previously, each farmer started from scratch in providing the LEPC with the information needed for the emergency response plan. Now, with the introduction of the standardized questionnaire, published by the Michigan State University Cooperative Extension Service, farmers can comply with the reporting requirements and provide emergency response planning information in one step. Under the new system, questionnaires, including

a brief explanation of Title III and the farmer's responsibilities under this statute, are distributed to the farming operations. The questionnaire also includes a partial list of EHSs specific to Michigan farms and requests site-specific information necessary for the development of site-specific plans. These plans are unique because they also incorporate the requirements of the Michigan Firefighters Right-To-Know Act, which requires that the fire chief of each fire district develop an emergency plan for all places that store or use certain chemicals. The list of chemicals in the Firefighters Right-To-Know Act is broader than the EHS list; it includes any hazardous chemicals used or produced regardless of quantity.

Another unique aspect of Monroe County is the extent to which the farmers are getting involved and complying with the regulations. Initially, farmers wanted to comply, but complicated regulations and the absence of any outreach made this difficult. With the introduction of the standardized questionnaire, compliance became easy. To date, the packet has been sent to 1,400 farmers in the county and hundreds have already been returned. Some farmers have even voluntarily shown up at the LEPC office to fill out the forms. The LEPC expects virtually all the farms in the county to be subject to reporting requirements because of the low threshold planning quantity of anhydrous ammonia, a substance used by most farmers. In addition, farmers seem to be taking the advice of the LEPC and using a three-ring notebook to keep an updated list of the chemicals used and stored on the premises, the MSDSs for those chemicals, and the response plan for their farm.

One reason for the success of this program is that local and state groups bridged the gap between the farmers and the LEPC. In part, this effort consisted of changing the tone of the reporting requirements from threats of enforcement to positive outreach describing how the

requirements could ultimately help to save the lives of the farmer's family and friends. By focusing on the risks involving the use of hazardous chemicals and the importance of planning, the perception of Title III was transformed from annoying paperwork to a beneficial program that identifies chemical hazards and prepares for potential emergencies involving these hazards.

The Farm Bureau, a trusted agribusiness organization, and the Michigan State University Cooperative Extension Service promoted the goals of the team of representatives by providing the necessary outreach to the farmers. The Michigan State University Cooperative Extension Service provided several different publications to farmers explaining the requirements of Title III. The Farm Bureau helped provide the networking system needed to reach all the farmers by including a questionnaire in their newsletter sent to 45,000 farms in Michigan. In addition, the Farm Bureau Network broadcast several statewide radio programs focusing on Title III. Cyril Keiffer said that the effort with the Farm Bureau "portrays that it is important to approach Title III from the positive for its ultimate goal is to save lives."

Planning

The identification of chemical hazards and the planning for these hazards are two of the major goals of Title III. The standardized questionnaire helps to meet both of these goals by requiring farms to notify the LEPC if EHSs are present at or above threshold planning quantity and by providing the LEPC with the necessary information for the planning process. Therefore, the responsibility for emergency preparedness is shared by both the farmer and the LEPC. As a result, it is essential that the farmer, the local fire department, the local agricultural agent, and the members of the

LEPC cooperate in order to guarantee the implementation of a plan that addresses all possible emergency scenarios.

Because the team's intention was to make Title III requirements "farmer-friendly," all of the material in the new questionnaire is written with the farmer in mind. For example, the EHS list in the brochure focuses on those chemicals relevant to a farmer; herbicides, pesticides, and fertilizers comprise the majority of the list. A glossary of the chemicals was taken from the CAMEO computer program, and presented to the farmers with the facts about their chemicals along with alternatives to the EHS substances they are currently using. Another feature of the questionnaire is that the chemical checklist is subdivided so that the plan indicates seasonal usage and storage so that emergency responders know what to expect during an incident at a specific site and during a specific season. This feature is particularly useful because Monroe County's LEPC will be able to determine the differences in preparedness requirements from one season to the next. Further, the questionnaire asks for information relevant in assessing the hazards of each farm including the nearest crossroads, private wells that may be on the farm, and the proximity to sensitive populations. The questionnaire closes with a sketch of the layout of the farm that must include all buildings, wells, storage tanks (above and below ground), and storage areas of chemicals.

By submitting the questionnaire, farmers have met their obligation to notify the LEPC as well as contributed significantly to the LEPC's task of developing an effective emergency response plan. In the future, information will be entered into the enhanced-911 computer system, so that if a call comes in on a farm that has a plan completed, EHS and other pertinent information will be displayed.

Once all the questionnaires are received from the farmers, emergency response plans will be developed for each fire district within the county. As of this point, a model plan has been written for the Temperance Fire Response District. After the completion of this model plan and its adaptation by the SERC, the Michigan State Police Emergency Management Division mailed a packet containing the questionnaire, the model plan, the glossary of chemicals, and an explanation of the process to all LEPCs in the state. This effort was part of the outreach to LEPCs by the State of Michigan to provide guidance in both gathering information and preparing contingency plans.

The emergency response plan for each district is divided into two sections. The first part is a generic description of the fire department and its capabilities, resources, and responsibilities. The second part consists of site-specific plans that are custom-designed for each farm reporting under section 302 within the district. The vulnerable zone calculations for site-specific plans were calculated using CAMEO based on the data regarding chemical quantities and storage patterns supplied by the farmers. After the response plan has been completed, each section 302 farm receives a copy of the Response Information Data Sheet (RIDS) for each chemical on the farm, the Farm Hazard Description/Population Vulnerability report that applies to their farm site, and emergency notification procedures for the farm.

If a spill occurs, the response will be a joint, cooperative effort between the farmer, agribusiness, and local government, and, if appropriate, state and federal agencies. The Facility Emergency Coordinator for each site is responsible for initially assessing the magnitude of the incident and notifying the Monroe County dispatch. The fire department will then be responsible for reviewing the farmer's assessment and evaluating the initial

classification. If help is needed, the fire department will notify the Monroe County Health Department's Environmental Health Division, and, if necessary, the Toledo Hazmat Team across the border in Ohio.

Funding

Much of the work planning and developing the Monroe County emergency response plan was accomplished because of the commitment and dedication of a group of individuals who did much of the work on their own time. The LEPC has, however, received funding from county funds through the county commissioners in the form of staff and supplies and from Emergency Management Allocations (EMA) from the state. In addition, the Michigan Farm Bureau, the Michigan State Police Emergency Management Division, and the Monroe County Emergency Management Division paid for the mailings to the farmers. There is also a bill currently in the Michigan Legislature that should provide money from general funds. In addition, Cyril Keiffer suggested that other LEPCs, attempting to initiate a similar plan, could offer students in health or environmental departments in universities the opportunity for paid or unpaid internships with the LEPC.

LESSONS LEARNED

Reducing Reporting Burden Helps Increase Compliance. The new model is successful in part because Monroe County's plan incorporates the requirements of Title III with the Michigan Firefighters Right-to-Know Act. This Act requires that the fire chief of each fire district develop an emergency plan for all locations that store or use hazardous chemicals, regardless of quantity. Because the Firefighters Right-to-Know Act and Title III regulations request similar information from the farmers, such as the description of the types and locations of hazardous chemicals stored on site, Monroe

County combined the programs so that the information in the standardized questionnaire satisfies both requirements. In addition, many volunteer firemen in the area are farmers in Monroe County, so they immediately saw the value in complying with both regulations by returning the site-specific information.

Money Isn't Everything. Lacking sufficient funding, the team of representatives sacrificed their personal time to develop a system that makes compliance for the farmers simpler and the writing of comprehensive response plans easier for the LEPC. The success of this program is due in part to the dedication of those individuals who approached the problem of compliance within the farming community from a different angle. According to Cyril Keiffer, "this program just goes to show the things that can be accomplished without a lot of money."

"Yes, It's Legislation, But Here's The Good Side..." One of the true lessons learned from the Monroe County is the role that education plays in implementing a successful program. At first, the farmers approached Title III with the attitude that this regulation was just another way for the government to control farmers and threaten them with fines. But, once the farmers of Monroe County were educated on the importance of Title III, their attitude changed and so did their willingness to comply with the regulations. When it was explained to them that Title III was intended to protect their families, friends, and neighbors, and when the process of compliance was made simpler, their attitude towards Title III changed. As of this point, the new system developed in Monroe County has been fully tested and the LEPC is continuing the outreach program started by the team of representatives and are awaiting the return of some of the questionnaires from farmers. So far, the program appears to be a success. The farmers have been very receptive to the standardized and simplified questionnaire.

Diversity Works. One premise of the LEPC is to bring together a diverse group of individuals — local and state, private and public — so that issues can be approached from a variety of different angles. Unfortunately, many times this creates problems because diversity can lead to conflicts of interest. However, despite many different interests, the team of representatives was able to develop a plan that made compliance fast, easy, and effective. As Cyril Keiffer says, Monroe County and Michigan provides proof for the benefits of diversity: "If you get the right people and involve them in the right way, it can be very successful."

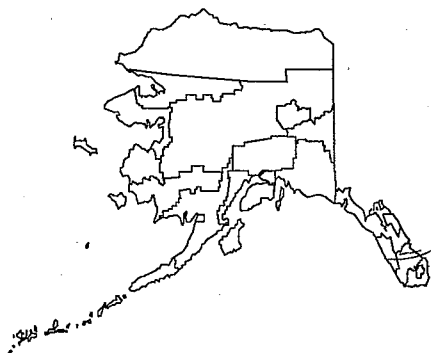
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State of Alaska

Alaska, America's "last frontier," as the state motto proclaims, is best known for its natural beauty and its oil industry. Less well known is the fact that hazardous substances are used in nearly every community in the state. Typical facilities include: crude oil tank production, pipeline, storage, and tanker operations; petroleum refineries; bulk fuel storage; fish processing plants; and pulp mills. Common hazardous substances used by these and other industries and transported through communities include: chlorine, used by fish processors, pulp mills, water and sewage treatment plants and swimming pool complexes; methanol, hydrochloric acid, and hydrofluoric acid, used at oil fields on the North Slope and Cook Inlet; and of course diesel fuel and other petroleum products. An atypical facility, and a significant concern in the state, is a major fertilizer manufacturer on the Kenai Peninsula.

Alaska is different from most states in its internal political districts. Instead of counties, the sub-state political jurisdictions are boroughs. There are 16 boroughs that encompass only 30 percent of the state land area, but encompass 80 percent of the state population including the largest cities, Anchorage (population 220,000), Fairbanks (29,000), and the capital, Juneau (26,000). The remainder of the state is in one huge unorganized borough. While 27 Emergency Planning Districts (EPDs) have been created by the state as planning areas, only 14 of those areas have LEPCs appointed by the SERC. The remaining 13 EPDs are in remote and rural areas that often have no road network, with populations less than 500 in each EPD, and few chemical hazards. In these areas, there is not only a lack of the diversity of people to fill the required occupational categories to form an LEPC, but with so few hazards, there is an

SERC Profile

Membership: includes 16 representatives from the state Departments of Environmental Conservation, Community and Regional Affairs, Public Safety, Military and Veteran Affairs, Health and Social Services, and Transportation; local government; industry; state Fire Chiefs Association; Native Americans; and public interest groups.

Organization: 14 LEPCs established in 27 Local Emergency Planning Districts

Topics: SERC Organization
Hazards Analysis
Planning

understandable lack of local motivation to form an LEPC. However, the Alaska SERC is considering alternative mechanisms and forums to address response issues in these areas. One potential solution is to use the planning areas of the Oil Pollution Act of 1990 to address any hazmat concerns in these rural districts. To date, all EPDs and the 14 LEPCs generally follow the jurisdictional boundaries of boroughs.

SERC Organization

Formed in 1987, the SERC, which meets quarterly, is composed of 16 members: nine state agency commissioners or their designees and seven public and private members. All activities of the SERC are administered by the Alaska Department of Environmental Conservation (DEC). In 1990, the state legislature passed House Bill 566, establishing the SERC in state law. The legislation provides funding for Title III implementation activities. The funds are appropriated annually by the state legislature from the Oil and Hazardous Substance Release Response Fund. The fund is generated by a surcharge on oil production to support emergency response and planning. For FY 92, \$900,000 was appropriated with 60 percent (\$540,000) being channeled to LEPC activities. For FY 93, 80 percent, or \$ 1.2 million of the state allocation, will be channeled to LEPC activities.

The commissioner of the DEC serves as SERC chair and oversees five standing committees. The Work Plan Committee helps the SERC identify priority activities and monitors the state's implementation of Title III. The LEPC Liaison Committee coordinates the establishment and activities of LEPCs. The Training Committee identifies training needs for responders. The Emergency Response Committee facilitates state and LEPC planning efforts by providing guidance documents and minimum content standards. The Public Awareness & Data Utilization Committee works

to raise awareness in Alaska and is coordinating the development of a statewide database for community right-to-know uses.

Hazards Analysis

One of the first objectives of the SERC has been fostering the development of LEPC comprehensive response plans. Hence, hazards analysis has been the SERC's most recent focus, as a precursor to plan development. The SERC is coordinating LEPC-based hazards analyses by providing technical assistance to the LEPCs in designing the scope of work and evaluating contractor proposals which will be funded by the legislature's annual appropriation. In some cases, groups of adjacent LEPCs will be working together; other LEPCs will work independently. Many LEPCs have already hired contractors, others are in the selection process. To date, Petersburg and Ketchikan are the only LEPCs that will not be using contractor assistance; in Ketchikan a borough employee will perform the analyses.

To complement the activities of the LEPCs, the SERC will conduct hazard analyses in all areas of the state not included in LEPCs, which is 70 percent of the state land area and 20 percent of the state population. The state projects that all contracts for hazards analyses will be awarded by June 1993 and all hazards analyses will be completed by the end of 1994.

The analyses will follow the airborne toxics approach outlined in the *Technical Guidance for Hazards Analysis* published by EPA, FEMA, and DOT, but, as required in the H.B. 566, the analysis has been expanded to include facilities with flammables (crude oil and bulk fuel storage facilities) and explosives (mining operations) — even though the chemicals are not covered under section 302 of Title III. In addition, the state will also be identifying those facilities with the potential for chemical and petroleum spills that could affect the drinking water supply or

sensitive ecosystems. Cooperative agreements are also underway to involve federal military facilities in identifying and assessing hazards at these facilities.

Once the hazards analyses have been compiled at the local level, they will be transferred into a statewide Computer Aided Management of Emergency Operations (CAMEO) system, and eventually incorporated into a Geographical Information Systems (GIS) format along with data from other state environmental programs such as RCRA and CERCLA. The CAMEO system is a computer program developed by EPA and the National Oceanographic and Atmospheric Administration, Department of Commerce, that has the capability to manage hazardous substance inventories, transportation data, estimate vulnerable zones, and calculate and store risk analyses. While CAMEO is an excellent tool for hazards analysis and emergency response, GIS systems typically have expanded storage, problem solving, and display capabilities. For example, a GIS can store potentially unlimited (limited only by memory capacity) amounts of data linked to a specified geographic area.

Applications of GIS for the SERC and the Department of Environmental Conservation include planning and enforcement. For example, if a water (ground or surface) quality sampling site is revealing traces of benzene, the GIS can be queried to show facilities that are in the vicinity, upstream of the well, that use benzene. This application will provide local environmental enforcement officers with quick and clear information to pursue potentially non-compliant facilities. Public health applications include developing GIS overlays that reveal concentrations of people with respiratory problems and facilities that use chlorine gas. This computerized inventory of information will enable the State Department of Environmental Conservation to make management decisions regarding environmental issues based on more

complete data. The state plans to analyze the information not only to plan for emergencies involving accidental releases, but also to evaluate long-term, chronic pollution problems and their effects on public health. In addition, the system will provide the capability to identify and map major permitted locations, identify and map contaminated sites, identify and map major transportation routes for oil and hazardous materials, and to monitor and map data from water quality programs. The state will also use the GIS to identify, based on concentrations of chemical hazards, where to encourage the development of volunteer response teams and where to locate equipment depots.

Planning

Because the hazards analyses are not completed, as yet no LEPC plans are approved. The SERC is currently developing emergency response guidelines that will include core elements and minimum requirements necessary for SERC approval of an LEPC plan. The SERC hopes to promote development of emergency plans by providing specific criteria to assist LEPCs as they develop their plans. The SERC met in October to discuss policies for plan review and approval.

House Bill 566 goes beyond the requirements of Title III in its efforts to comprehensively identify hazards and plan an integrated response. To that end, the law broadens the definition of hazardous substances to include oil for the purposes of hazards analyses and response planning. This is a significant distinction from the federal law and could double the amount of information collected and analyses performed. Thus, the law expands the assessment of the chemical-related hazards in a community and identifies the potential areas/population to be impacted should a release occur. Further, the law and SERC policies together use several mechanisms to ensure integrated planning and procedures for response. This is achieved by requiring that the

statewide all-hazards plan, addressing natural disasters and technological disasters, be coordinated with the statewide hazardous materials plan.

Also, the state plan will be coordinated with the EPA Region 10 Regional Contingency Plan (RCP) and potentially the Region 10 Supplement to the Federal Response Plan (FRP-Regional Supplement), Emergency Support Function #10: Hazardous Materials. Due to the geography of Region 10, Alaska's RCP and FRP Regional Supplement are separate from the rest of Region 10. This coordination will support a state/federal system of response for human-caused hazardous material/oil pollution incidents or in the event a natural disaster (earthquake or flood) creates hazardous material/oil incidents. The same is true at the local level, i.e., the LEPC hazardous materials plans will be coordinated with the borough or local government all-hazards plans. When the regional plans for oil spill contingency are developed as required under the Oil Pollution Act of 1990, they will be coordinated and potentially combined with the EPA Region 10 RCP and FRP-Regional Supplement.

Yet another provision under the law creates the Spill Technology Review Council within the SERC to identify spill containment, dispersement, and cleanup products for use in a release in Alaska's arctic and sub-arctic climate. In 1991, the Council issued its first annual report. The report recommends research objectives for 1992 that include: utilization of skimmers and oil/water separators, the effectiveness of dispersants, in situ burning, oil recovery from ice, in situ and ex situ bioremediation of soils contaminated by hazardous materials, and reuse/recovery of hazardous wastes.

LESSONS LEARNED

Integrated Planning At All Levels Can Overcome Most Obstacles. Several events have shaped the emergence of Alaska's drive to form a statewide integrated planning process: the Exxon-Valdez incident, the creation of LEPCs, and the multitude of federal facilities in the state. These events focused the state on the need for integrated planning and shared capabilities among federal, state, regional, and local governments; LEPCs; and industry. Camille Stephens, staff with the SERC, explains Alaska's challenge: "Many industries, federal facilities, and a few local governments in Alaska have very advanced and capable response teams. Yet, the distances and difficulty in access to areas of Alaska demand that mutual aid agreements be created and jurisdictional borders and issues be overcome. Our goal is to instill the concept of working together into the various agencies and industry to build an integrated response network that benefits the entire state."

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More Successful Practices

Additional **Successful Practices in Title III Implementation** technical assistance bulletins are available from your Regional Chemical Emergency Preparedness and Prevention Coordinator (see the listing on the following page), or call the Emergency Planning and Community Right-to-Know Information Hotline at (800) 535-0202. The following bulletins are currently available:

Successful Practices #1

Doc. # OSWER-89-006.1, January 1989.

- State of Kansas
- Washtenaw County, Michigan
- Butler County, Kansas
- Jefferson County, Kentucky

Successful Practices #2

Doc. # OSWER-89-006.2, August 1989

- Calhoun County, Alabama
- Pampa, Texas
- State of Wisconsin
- Cuyahoga County, Ohio
- Racine County, Wisconsin
- State of Idaho

Successful Practices #3

Doc. # OSWER-89-006.3, December 1989.

- Woodbury County, Iowa
- State of Virginia
- Fairfax County, Virginia
- Pierce County, Washington

Successful Practices #4

Doc. # OSWER-90-006.1, March 1990.

- New York, New York
- El Paso County, Colorado
- Alexandria, Virginia
- State of Maine

Successful Practices #5

Doc. # OSWER-90-006.2, June 1990.

- Tinker Air Force Base, Oklahoma
- State of Connecticut
- Cumberland County, Maine
- Wyandotte County, Kansas

Successful Practices #6

Doc. # OSWER-90-006.3, September 1990.

- State of Ohio
- Hamilton County, Ohio
- Wallingford, Connecticut
- Ouachita Parish, Louisiana

Successful Practices #7

Doc. # OSWER-91-006.1, February 1991.

- Cameron County, Texas
- Bucks County, Pennsylvania
- Harford County, Maryland
- Dallas County, Texas

Successful Practices #8

Doc. # OSWER-91-006.2, October 1991.

- Cherry Hill, New Jersey
- Manitowoc County, Wisconsin
- Greene County, Missouri
- State of Hawaii
- Arapahoe County, Colorado

Successful Practices #9

Doc. # OSWER-92-006.1, September 1992.

- Natrona County, Wyoming
- Erie County, New York
- State of Arizona
- Mohave County, Arizona

Successful Practices #10

Doc. # OSWER-93-006.1, May 1993.

- State of Florida
- District 5 LEPC, Florida
- Monroe County, Michigan
- State of Alaska

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States By Region

4 - Alabama
10 - Alaska
9 - Arizona
6 - Arkansas
9 - California
8 - Colorado
1 - Connecticut
3 - Delaware
3 - D.C.
4 - Florida
4 - Georgia
9 - Hawaii
10 - Idaho
5 - Illinois
5 - Indiana
7 - Iowa
7 - Kansas
4 - Kentucky

6 - Louisiana
1 - Maine
3 - Maryland
1 - Massachusetts
5 - Michigan
5 - Minnesota
4 - Mississippi
7 - Missouri
8 - Montana
7 - Nebraska
9 - Nevada
1 - New Hampshire
2 - New Jersey
6 - New Mexico
2 - New York
4 - North Carolina
8 - North Dakota
5 - Ohio
6 - Oklahoma

10 - Oregon
3 - Pennsylvania
1 - Rhode Island
4 - South Carolina
8 - South Dakota
4 - Tennessee
6 - Texas
8 - Utah
1 - Vermont
3 - Virginia
10 - Washington
3 - West Virginia
5 - Wisconsin
8 - Wyoming
9 - American Samoa
9 - Guam
2 - Puerto Rico
2 - Virgin Islands

Successful Practices in Title III Implementation: Subject Index*

Compliance (Enforcement):

Kansas (SP1:4); Idaho (SP2:14-15); Arapahoe County, Colorado (SP8:26-27); District 5 LEPC, Florida (SP10:6,9); Monroe County, Michigan (SP10:12-15)

Identifying/contacting facilities:

Calhoun County, Alabama (SP2:1-2); Wisconsin (SP2:8); Fairfax County, Virginia (SP3:9); New York, New York (SP4:3-4); Alexandria, Virginia (SP4:13); Tinker Air Force Base, Oklahoma (SP5:2); Wyandotte County, Kansas (SP5:15-16); Hamilton County, Ohio (SP6:11); Cameron County, Texas (SP7:4); Bucks County, Pennsylvania (SP7:11); Natrona County, Wyoming (SP9:1-2); Florida (SP10:1-3)

Inspections:

Pampa, Texas (SP2:4-5); Racine County, Wisconsin (SP2:12)

Emergency Plans:

Jefferson County, Kentucky (SP1:9-10); Idaho (SP2:14); Pierce County, Washington (SP3:13); Tinker Air Force Base, Oklahoma (SP5:2); Bucks County, Pennsylvania (SP7:10-11); Monroe County, Michigan (SP10:12-14)

Community Consequences:

Racine County, Wisconsin (SP2:12-13); Wallingford, Connecticut (SP6:13)

Coordination with other LEPCs and communities:

Harford County, Maryland (SP7:14-15); Dallas County, Texas (SP7:19); Arapahoe County, Colorado (SP8:23); Erie County, New York (SP9:5-8); Alaska (SP10:20)

Existing plans:

Cumberland County, Maine (SP5:10-11); Cherry Hill, New Jersey (SP8:1)

Facility input:

Cuyahoga County, Ohio (SP2:10); New York, New York (SP4:3); El Paso County, Colorado (SP4:6-7); Wyandotte County, Kansas (SP5:14-15); Hamilton County, Ohio (SP6:9); Monroe County, Michigan (SP10:12-14)

Facility plans:

Fairfax County, Virginia (SP3:9)

Hazard analysis:

Butler County, Kansas (SP1:7); Alexandria, Virginia (SP4:11-12); Alaska (SP10:18-19)

Planning guidance:

Kansas (SP1:3); New York, New York (SP4:2); Connecticut (SP5:5-6); Alaska (SP10:19)

*The citation provided for each profile refers to the issue number (SP3 refers to the third issue of **Successful Practices**) and the page number(s) within that issue.

Emergency Plans (continued):**Public alert and notification system:**

Wyandotte County, Kansas (SP5:17); Monroe County, Michigan (SP10:14-15)

Structure:

Ohio (SP6:1-2)

Exercises:**Decontamination:**

Greene County, Missouri (SP8:11)

Evacuation and sheltering:

Greene County, Missouri (SP8:14); Arapahoe County, Colorado (SP8:24)

Field programs:

Woodbury County, Iowa (SP3:2); Cumberland County, Maine (SP5:11); Hamilton County, Ohio (SP6:9-10); Wallingford, Connecticut (SP6:13-14); Ouachita Parish, Louisiana (SP6:21-22); Manitowoc County, Wisconsin (SP8:8); Hawaii (SP8:21); Arapahoe County, Colorado (SP8:24); Natrona County, Wyoming (SP9:3); Mohave County, Arizona (SP9:16); District 5 LEPC, Florida (SP10:8-9)

Table-top programs:

Hartford County, Maryland (SP7:15); Dallas County, Texas (SP7:20); Cumberland County, Maine (SP5:11); Hamilton County, Ohio (SP6:9-10); Erie County, New York (SP9:7); Arizona (SP9:12-13); Mohave County, Arizona (SP9:17)

Funding:**Citizen Suits:**

Erie County, New York (SP9:7)

Donations:

Jefferson County, Kentucky (SP1:10); Calhoun County, Alabama (SP2:2); Pierce County, Washington (SP3:14); Cameron County, Texas (SP7:4); Bucks County, Pennsylvania (SP7:9)

Fee systems:

Kansas (SP1:4); Washtenaw County, Michigan (SP1:5); Calhoun County, Alabama (SP2:2); Wisconsin (SP2:7); Fairfax County, Virginia (SP3:10); Maine (SP4:16-18); Ohio (SP6:3); Florida (SP10:3); District 5 LEPC, Florida (SP10:7); Alaska (SP10:18)

Grants:

Connecticut (SP5:6); District 5 LEPC, Florida (SP10:7); Monroe County, Michigan (SP10:15)

State and local agency budgets:

Jefferson County, Kentucky (SP1:10); Wisconsin (SP2:7); Connecticut (SP5:6); Ohio (SP6:3); Bucks County, Pennsylvania (SP7:9); Hartford County, Maryland (SP7:16); Dallas County, Texas (SP7:20); Florida (SP10:3-4)

Hazards Analysis:**Hazard identification:**

Cuyahoga County, Ohio (SP2:9-10); Alexandria, Virginia (SP4:11-12); Wyandotte County, Kansas (SP5:13-14); Hamilton County, Ohio (SP6:7-9); Arapahoe County, Colorado (SP8:23-24); Monroe County, Michigan (SP10:12-14); Alaska (SP10:18)

Hazards Incidents Complexity Analysis:

Kansas (SP1:3); Wyandotte County, Kansas (SP5:13-14)

Risk analysis:

Hamilton County, Ohio (SP6:8-9); Dallas County, Texas (SP7:19)

Transportation:

Kansas (SP1:3); Butler County, Kansas (SP1:7); Alexandria, Virginia (SP4:11-12); District 5 LEPC, Florida (SP10:7-8)

Vulnerability zones:

Cuyahoga County, Ohio (SP2:9); Hamilton County, Ohio (SP6:7-9); Wallingford, Connecticut (SP6:14-15); Greene County, Missouri (SP8:13-14); Monroe County, Michigan (SP10:14); Alaska (SP10:19)

Information Management (Computer Systems):**CAMEO:**

Jefferson County, Kentucky (SP1:10); Pampa, Texas (SP2:5); Racine County, Wisconsin (SP2:13); New York, New York (SP4:2); El Paso County, Colorado (SP4:7); Wyandotte County, Kansas (SP5:16); Hamilton County, Ohio (SP6:10); Wallingford, Connecticut (SP6:14); Bucks County, Pennsylvania (SP7:8); Cherry Hill, New Jersey (SP8:2-3); Greene County, Missouri (SP8:13); Hawaii (SP8:17-19); Arapahoe County, Colorado (SP8:25); Natrona County, Wyoming (SP9:3); Arizona (SP9:10); District 5 LEPC, Florida (SP10:6,7); Monroe County, Michigan (SP10:14); Alaska (SP10:19)

Conversion software:

Greene County, Missouri (SP8:13)

dBase:

El Paso County, Colorado (SP4:7); Bucks County, Pennsylvania (SP7:9); Natrona County, Wyoming (SP9:1-2); Florida (SP10:3); Alaska (SP10:18)

Dispatch system:

Bucks County, Pennsylvania (SP7:9)

Modified reporting format:

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Networks:

Idaho (SP2:15)

"Packet" radio:

El Paso County, Colorado (SP4:7); Cherry Hill, New Jersey (SP8:3)

Information Management (continued):**Software programs:**

Kansas (SP1:3-4); Pampa, Texas (SP2:5-6); Virginia (SP3:5-6); Fairfax County, Virginia (SP3:9-10); New York, New York (SP4:1-2); Tinker Air Force Base, Oklahoma (SP5:2-3); Connecticut (SP5:6-7); Hamilton County, Ohio (SP6:10); Ouachita Parish, Louisiana (SP6:21); Bucks County, Pennsylvania (SP7:8); Arapahoe County, Colorado (SP8:25); Natrona County, Wyoming (SP9:3); District 5 LEPC, Florida (SP10:7); Alaska (SP10:19)

Worksheet forms:

Washtenaw County, Michigan (SP1:5)

LEPC Coordination:**Coordination with SERC:**

Kansas (SP1:2); Hamilton County, Ohio (SP6:10); Florida (SP10:3)

Federal facilities:

Tinker Air Force Base, Oklahoma (SP5:1)

Inter-LEPC coordination:

Woodbury County, Iowa (SP3:3); Virginia (SP3:4-5); Alexandria, Virginia (SP4:12-13); Wyandotte County, Kansas (SP5:17); Mohave County, Arizona (SP9:16)

International coordination:

Maine (SP4:18); Cameron County, Texas (SP7:1-3); Erie County, New York (SP9: 5-8); Arizona (SP9:13)

LEPC Organization:**Pre-SARA/Title III organizations:**

Racine County, Wisconsin (SP2:11); Woodbury County, Iowa (SP3:1-2); Bucks County, Pennsylvania (SP7:7-8); Cherry Hill, New Jersey (SP8:1); Hawaii (SP8:19-20); Florida (SP10:1,3); District 5 LEPC, Florida (SP10:5)

Subcommittees:

Jefferson County, Kentucky (SP1:10); Calhoun County, Alabama (SP2:2); Pampa, Texas (SP2:4); Ouachita Parish, Louisiana (SP6:17-18); Bucks County, Pennsylvania (SP7:7-8); Greene County, Missouri (SP8:11-13); Mohave County, Arizona (SP9:15-16); District 5 LEPC, Florida (SP10:5-6,8)

Liability:

Virginia (SP3:5); Pierce County, Washington (SP3:15); Maine (SP4:16)

Outreach Programs:

Wisconsin (SP2:8); Hawaii (SP8:19)

Agriculture:

Racine County, Wisconsin (SP2:11-12); Manitowoc County, Wisconsin (SP8:6-7); Florida (SP10:2-3); Monroe County, Michigan (SP10:11-15)

Audio/Visual Aids:

Virginia (SP3:4-5); Ohio (SP6:2-3); Harford County, Maryland (SP7:15); Cherry Hill, New Jersey (SP8:4); District 5 LEPC, Florida (SP10:6)

Brochures, factsheets, and booklets:

Kansas (SP1:2); Cuyahoga County, Ohio (SP2:10); Idaho (SP2:14); New York, New York (SP4:4); Hamilton County, Ohio (SP6:10); Wallingford, Connecticut (SP6:15); Harford County, Maryland (SP7:15); Arapahoe County, Colorado (SP8:25); Florida (SP10:2); District 5 LEPC, Florida (SP10:6); Monroe County, Michigan (SP10:13-14)

Guidelines:

Cuyahoga County, Ohio (SP2:10); Virginia (SP3:4-5); Florida (SP10:3); Alaska (SP10:19)

Indian Tribes:

Arizona (SP9:12-13)

Industry:

Virginia (SP3:4-5); Arizona (SP9:9-11); Florida (SP10:2)

Lectures & workshops:

Butler County, Kansas (SP1:7); Idaho (SP2:14); Pierce County, Washington (SP3:14); New York, New York (SP4:4); Connecticut (SP5:7); Cameron County, Texas (SP7:4); Dallas County, Texas (SP7:20); Manitowoc County, Wisconsin (SP8:6-8); Arizona (SP9:10-13); Natrona County, Wyoming (SP9:2-3); Florida (SP10:2); District 5 LEPC, Florida (SP10:6)

Library displays:

Pierce County, Washington (SP3:14); El Paso County, Colorado (SP4:8)

Local government:

Cherry Hill, New Jersey (SP8:4)

Mailing lists:

New York, New York (SP4:4)

Media Use (TV, radio, newspaper):

Kansas (SP1:3); Butler County, Kansas (SP1:7); Woodbury County, Iowa (SP3:2); Fairfax County, Virginia (SP3:10); Pierce County, Washington (SP3:14); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Ouachita Parish, Louisiana (SP6:18-20); Cameron County, Texas (SP7:4); Harford County, Maryland (SP7:15); Dallas County, Texas (SP7:20); Manitowoc County, Wisconsin (SP8:6-8); Natrona County, Wyoming (SP9:2,4); Mohave County, Arizona (SP9:16); Florida (SP10:3); District 5 LEPC, Florida (SP10:6); Monroe County, Michigan (SP10:13)

Public schools:

El Paso County, Colorado (SP4:8); District 5 LEPC, Florida (SP10:6)

Prevention:

Washtenaw County, Michigan (SP1:5); Hamilton County, Ohio (SP6:11); Florida (SP10:4); District 5 LEPC, Florida (SP10:6)

Public Alert System:

Wyandotte County, Kansas (SP5:17)

Reporting Modifications:

Ohio (SP6:2); Oauchita Parish, Louisiana (SP6:20); Hawaii (SP8:19); Florida (SP10:2)

Right-to-Know Laws:

Washtenaw County, Michigan (SP1:5); Wisconsin (SP2:8); New York, New York (SP4:4); Maine (SP4:15-16); Wyandotte County, Kansas (SP5:16-17); Florida (SP10:1); Monroe County, Michigan (SP10:15); Alaska (SP10:18,19)

Section 313 Data:**Accessibility and analysis:**

Virginia (SP3:6); El Paso County, Colorado (SP4:9); Connecticut (SP5:8); Ohio (SP6:3-5); Dallas County, Texas (SP7:18);

Compliance:

Fairfax County, Virginia (SP3:8); Ohio (SP6:4); Florida (SP10:1)

Special Planning Features:**Chemical Stockpile Disposal Program facilities:**

Harford County, Maryland (SP7:16)

Federal facilities:

Tinker Air Force Base, Oklahoma (SP5:2); Harford County, Maryland (SP7:14)

Hospital Preparedness:

Erie County, New York (SP9:6-8); District 5 LEPC, Florida (SP10:5,8)

Indian Tribes:

Mohave County, Arizona (SP9:12-13)

Nursing homes:

Cherry Hill, New Jersey (SP8:4)

Schools:

Wallingford, Connecticut (SP6:13); Harford County, Maryland (SP7:14)

Transportation:

Alexandria, Virginia (SP4:11-12); Oauchita Parish, Louisiana (SP6:21-22); District 5 LEPC, Florida (SP10:7-8)

Training Programs:**Coordination with government organizations:**

Virginia (SP3:4); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Connecticut (SP5:7); Bucks County, Pennsylvania (SP7:11); Hawaii (SP8:20)

Facility management personnel:

Tinker Air Force Base, Oklahoma (SP5:3); Bucks County, Pennsylvania (SP7:11)

First-responders:

Pierce County, Washington (SP3:13-14); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Connecticut (SP5:7); Cumberland County, Maine (SP5:11); Wallingford, Connecticut (SP6:15); Cameron County, Texas (SP7:3); Harford County, Maryland (SP7:15); Cherry Hill, New Jersey (SP8:3-4); Arizona (SP9:13)

Hazmat team personnel:

Jefferson County, Kentucky (SP1:9); Pampa, Texas (SP2:5); Virginia (SP3:4); Connecticut (SP5:7); Harford County, Maryland (SP7:15); Hawaii (SP8:20)

LEPC:

Kansas (SP1:3); Virginia (SP3:4); Alexandria, Virginia (SP4:13-14); Connecticut (SP5:7)

Medical personnel:

Racine County, Wisconsin (SP2:12)

Potential CAMEO users:

Cherry Hill, New Jersey (SP8:3-4); Hawaii (SP8:18); District 5 LEPC, Florida (SP10:6)

Public:

Bucks County, Pennsylvania (SP7:11)

Train-the-Trainer:

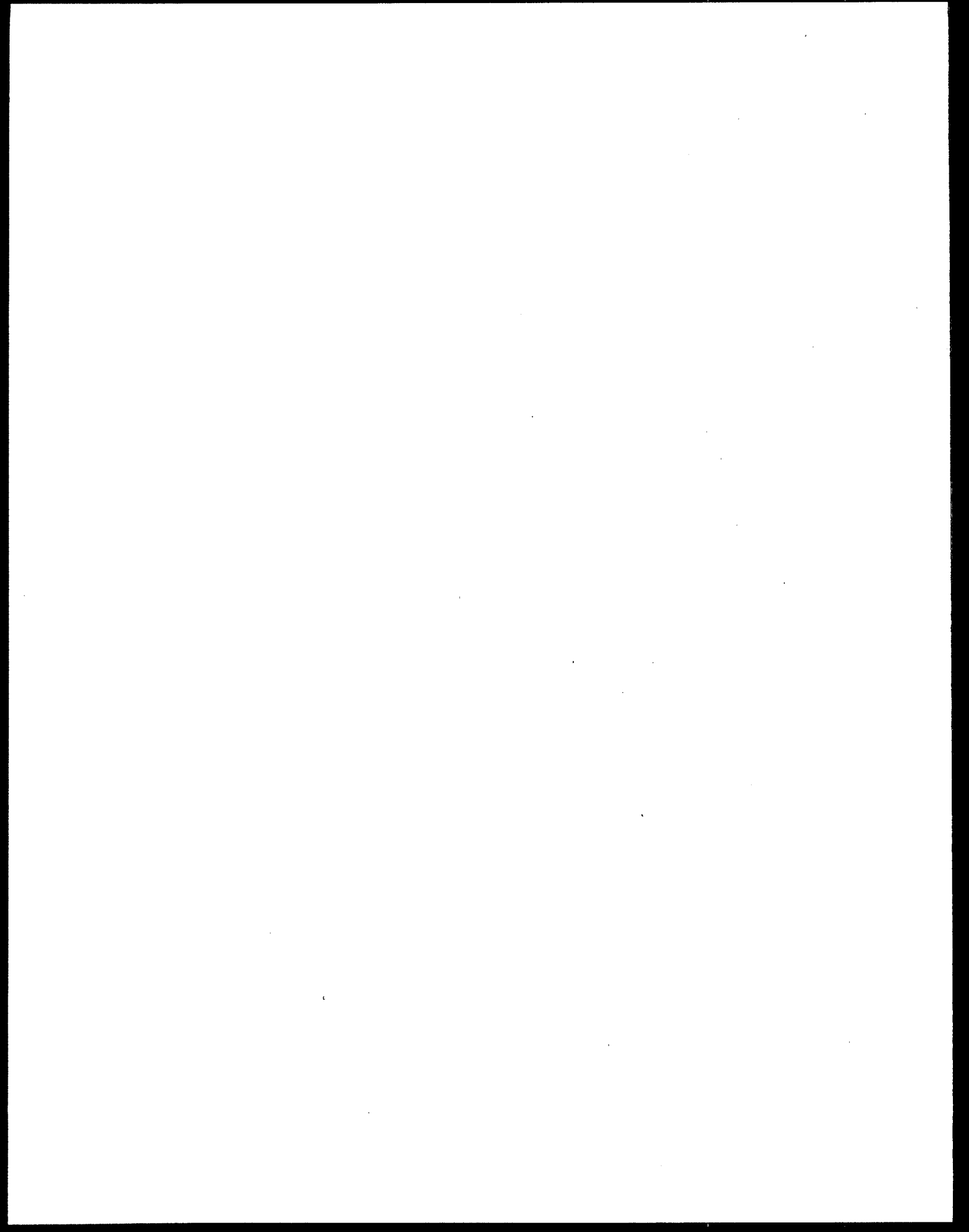
Idaho (SP2:15); Maine (SP4:18); Cherry Hill, New Jersey (SP8:4); Erie County, New York (SP9:7)

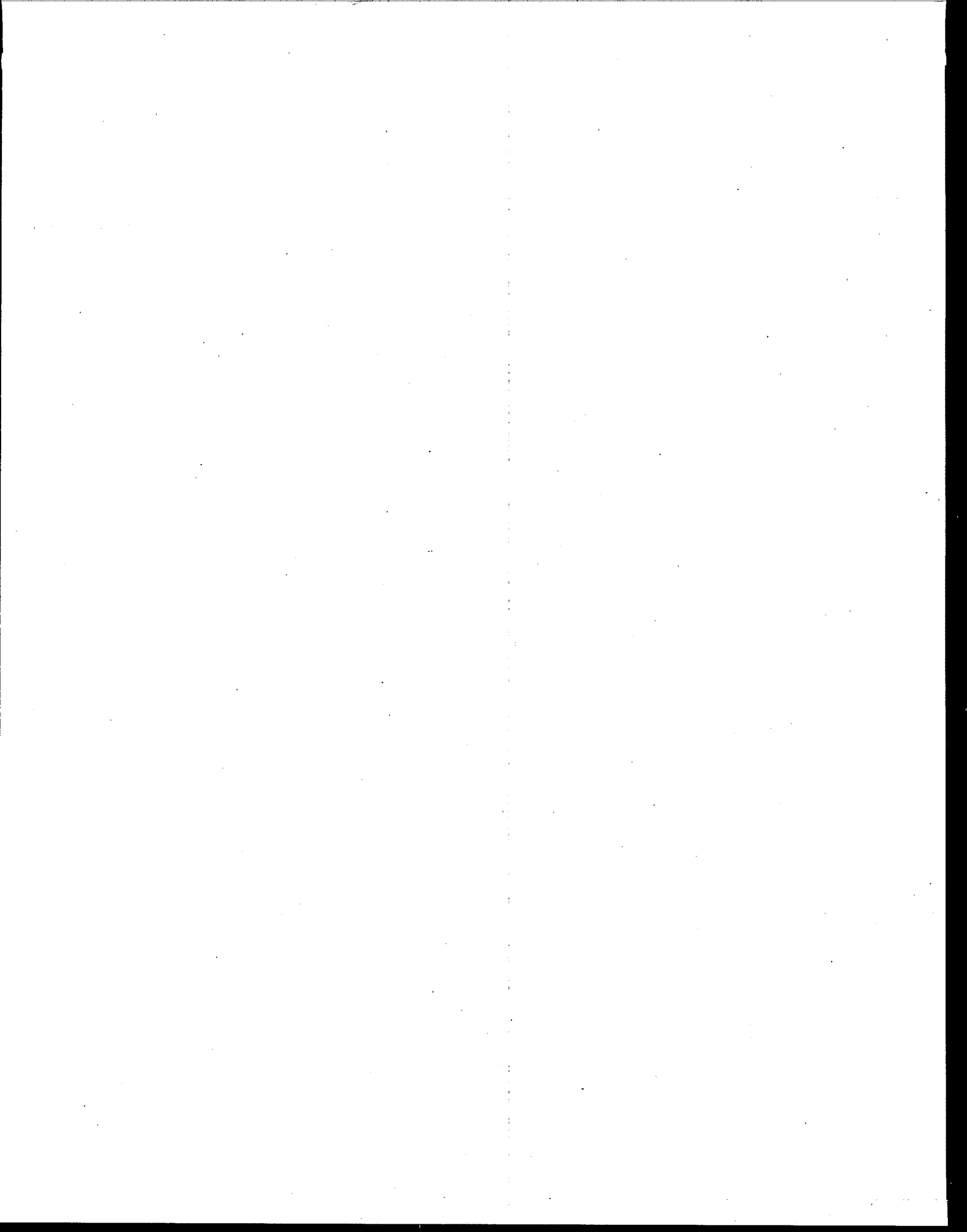
Vulnerability Analysis:

Cuyahoga County, Ohio (SP2:9); Hamilton County, Ohio (SP6:8); Wallingford, Connecticut (SP6:14-15); Greene County, Missouri (SP8:13-14); Monroe County, Michigan (SP10:14); Alaska (SP10:19)

HIRT:

Bucks County, Pennsylvania (SP7:11)







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